

REMARKS/ARGUMENTS

Claims 2-6, 8, 10, 12-16, 18, 20, 22-26, 28, and 30 are pending. Claims 2-6, 8, 10, 12-16, 18, 20, 22-26, 28 and 30 have been amended. No claims have been added, canceled, or withdrawn.

This response addresses the outstanding 35 USC §101 and 35 USC §112, second paragraph, rejections to place this application into condition for allowance. In view of the above claim amendments and the following remarks, withdrawal of all outstanding rejections to the pending subject matter is respectfully requested.

Claim Amendments

Independent **claims 5, 8, and 10** have been amended to indicate that the subject matter is implemented by a computer. **Claims 2-4, and 6** have been amended to more particularly show antecedent basis from base claim 5. For example, the phrase "A method as recited in claim 5" has been changed to "The method of claim 5".

The preambles of independent **claims 15, 18, and 20** have been amended to indicate that the subject matter is executed by a computer or machine. More particularly, the respective preambles have been amended from "Computer-readable media comprising computer-executable instructions" to "A computer-readable medium comprising computer-program instructions executable by a processor". The preambles of **claims 12-14, and 16** have been amended to more particularly show antecedent basis from their respective base claims. For example, the preamble phrase "Computer-readable media as recited in claim ..." has been amended to "The computer-readable medium of claim"

1 The preambles of **claims 22-24 and 26**, which depend from claim 25 have
2 been amended to more particular show proper antecedent basis from their
3 respective base claim. For example, the preambles have been amended from "A
4 computing device as recited in claim 25" to "The computing device of claim 25".

5 Claims 5, 8, 10, 15, 18, 20, 25, 28, and 30 have been amended to address
6 the outstanding 35 USC §112, second paragraph rejections, as indicated below.

7 **35 USC §101 Rejections**

8 Claims 2-6, 8, 10, 12-16, 18, and 20 stand rejected under 35 USC §101
9 because the claimed invention is directed to non-statutory subject matter.

10 The Action indicates that claims 5, 8 and 10 should be amended to indicate
11 that the subject matter is implemented by a computer. Applicant has so amended
12 claims 5, 8, and 10. The Action also indicates that claims 12-16, 18, and 20
13 should be amended to indicate that the corresponding instructions are executable
14 or run by a computer, rather than just embedded in a computer-readable medium.
15 Applicant has so amended claims 12-16, 18, and 20.

16 In view of these claim amendments, withdrawal of the 35 USC §101
17 rejections to claims 2-6, 8, 10, 12-16, 18, and 20 is respectfully requested.

18 **35 USC §112, Second Paragraph Rejections**

19 Claims 5, 8, 10, 15, 18, 20, 25, 28, and 30 stand rejected under 35 USC
20 §112, second paragraph, as being indefinite for failing to particularly point out and
21 distinctly claim the subject matter which applicant regards as the invention.

22 In section 5, the Action asserts that pronouns are not permitted, only what
23 is being referred by "that" should be set forth in the claim. In view of the above,
24
25

1 Applicant has amended **claims 5, 8, 10, 15, 18, 20, 25, and 28** to address the use
2 of terms "that", and "such that" in the claim language.

3 In section 6, the Action asserts that claims 5, 8, 10, 15, 18, 20, 25, 28, and
4 30 lack proper antecedent basis for the phrase "the similar documents". Applicant
5 respectfully disagrees. In each of the indicated claims, the phrase "a plurality of
6 similar documents" precedes any use of the phrase "the similar documents". Thus,
7 the phrase "the similar documents" has proper antecedent basis in each of the
8 indicated claims. However, to more clearly show that subsequent use of "the
9 similar documents" has proper antecedent basis, Applicant has removed the phrase
10 "a plurality of" from the phrase "a plurality of similar documents". To be
11 consistent, and because the plurals "queries" and "sysnsets" are expressly plural
12 without need of the phrase "a plurality of", Applicant has also carried this
13 amendment to other plural types of claim features such as "queries" and "synsets".

14 In view of the above amendments, withdrawal of the 35 USC §112, second
15 paragraph, rejections to claims 5, 8, 10, 15, 18, 20, 25, 28 and 30 is respectfully
16 requested.

17 **Conclusion**

18 The pending claims are in condition for allowance, and action to that end is
19 urgently requested. Should any issue remain that prevents allowance of the
20 application, the Office is encouraged to contact the undersigned prior or issuance
21 of a subsequent Office action.
22
23
24
25

1 Respectfully Submitted,

2 Dated: 11/08/2005

By: Brian Hart

Brian G. Hart

Reg. No. 44, 421

(303) 539-0265 x 241

BEST AVAILABLE COPY